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*Attorneys for Court-Appointed Receiver
 Colliers International NJ, LLC*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY**

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U.S. BANK NATIONAL ASSOCIATION,	: Civil Action No. 19-cv-17865 (MCA)(LDW)
AS TRUSTEE FOR THE REGISTERED	:
HOLDERS OF WELLS FARGO	:
COMMERCIAL MORTGAGE	: <i>Document Electronically Filed</i>
SECURITIES, INC., MULTIFAMILY	:
MORTGAGE PASS-THROUGH	:
CERTIFICATES, SERIES 2018-SB51, <i>et al.</i> ,	: NOTICE OF MOTION FOR ORDER
	: APPROVING SALE OF CERTAIN
	: PROPERTIES FREE AND CLEAR
Plaintiffs,	:
	:
vs.	: ORAL ARGUMENT REQUESTED
	:
LENOX TEMPLE LLC; LENOX LIBERTY	:
LLC; LENOX HUDSON LLC;	: Motion Day: March 15, 2021
HACKENSACK NORSE LLC; <i>et al.</i> ,	:
	:
Defendants.	:
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JLS EQUITIES, LLC A NEW YORK	: Civil Action No. 19-cv-17615 (MCA)(LDW)
LIMITED LIABILITY COMPANY.,	:
	:
Plaintiff,	:
	:
vs.	:
	:
LENOX HUDSON, LLC; LENOX TEMPLE,	:
LLC; <i>et al.</i> ,	:
	:
Defendants.	:
-----X	

TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, on March 15, 2021, or as soon thereafter as counsel may be heard, the undersigned counsel for Colliers International NJ LLC, the Court-appointed Receiver for the properties that are subject of the referenced actions (the “Receiver”), shall move before the Honorable Madeline Cox Arleo, U.S.D.J., District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order approving Receiver’s sale of the properties owned by Defendants Lenox Temple LLC, Lenox Liberty LLC, Lenox Hudson LLC, and Hackensack Norse LLC, free and clear of all prior encumbrances, liens, rights, and interest, approving the Receiver’s disbursement of proceeds from the sale, and for related relief, pursuant to the prior Orders of this Court and Fed. R. Civ. P. 66.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Receiver shall rely on the accompanying Declarations of Richard Madison and Jaimee Katz Sussner, Esq., with accompanying exhibits, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting Receiver’s Motion is enclosed herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), the Receiver hereby request oral argument.

Respectfully submitted,

s/ Jaimee Katz Sussner
JAIMEE KATZ SUSSNER

*Attorneys for Court-Appointed
Receiver Colliers International
NJ LLC*

Dated: February 19, 2021

SERVICE LIST

1. Lenox Temple LLC, Lenox Liberty LLC, Lenox Hudson LLC, and Hackensack Norse LLC (*By First Class Mail*)
c/o Mr. Seth Levine
636 South Forest Drive
Teaneck, New Jersey 07666
2. Lenox Temple LLC, Lenox Liberty LLC, Lenox Hudson LLC, and Hackensack Norse LLC (*By ECF*)
c/o Gene Wurzel Rosen, Esq.
200 Garden City Plaza, Suite 405
Garden City, NY 11530
3. Seth Levine (*By E-Mail*)
c/o Jacob Kaplan, Esq.
Brafman & Associates, P.C.
767 Third Avenue, 26th Floor
New York, New York 10017
4. U.S. Bank National Association, as Trustee, and SBL NJ Noteholder LLC
c/o Amy Hatch, Esq. (*By ECF*)
Polsinelli PC
600 Third Avenue, 42nd Floor
New York, New York 10016
5. Borough of Little Ferry Tax Collector (*By First Class Mail*)
Attention: Frank Berardo, Tax Collector
215-217 Liberty Avenue
Little Ferry, New Jersey 07643
6. Bureau of Housing Inspection (*By First Class Mail*)
State of New Jersey
Department of Community Affairs
P.O. Box 800
Trenton, New Jersey 08625-0800
7. The State of New Jersey (*By First Class Mail*)
Office of the Attorney General
Hughes Justice Complex
25 W. Market St.
P.O. Box 080
Trenton, NJ 08625

8. U.S. Attorney's Office (*By First Class Mail*)
Peter W. Rodino, Jr. Federal Building
970 Broad Street, 7th Floor
Newark, NJ 07102
9. Nicole M. Lomax (*By First Class Mail*)
c/o Essex County Board of Social Services
18 Rector Street, 9th Floor
Newark, New Jersey 07102
10. New Jersey Division of Taxation (*By First Class Mail*)
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11. Judah A. Zelmanovitz, Esq. (*By First Class Mail*)
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12. Neil Fink, Esq. (*By First Class Mail*)
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14. Herbert Tepfer (*By ECF*)
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1211 Liberty Avenue
Hillside, New Jersey 07205
Counsel for Herbert Tepfer
15. Toledo Plumbing & Heating Inc. (*By First Class Mail*)
c/o Bittiger Elias & Triolo P.C.
12 Route 17 North, Suite 206
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16. Hutton Ventures LLC (*By ECF*)
c/o Gerard S. Catalanello, Esq.
Alston & Bird LLP
90 Park Avenue
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17. Oritani Bank (*By First Class Mail*)
Attention: Christopher Carola, Vice President
370 Pascack Road
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Washington Township, New Jersey 13676-1329
18. Federal Home Loan Mortgage Corporation (*By First Class Mail*)
c/o Jerry A. Cuomo, Esq.
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One Gateway Center, 4th Floor
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19. JLS Equities LLC (*By ECF*)
c/o Timothy P. Duggan, Esq.
Stark & Stark
P.O. Box 5315
Princeton, New Jersey 08543
20. Larry Portal, Frank Maiorano, Gracy Weberman, Jahn Brodwin, Donald J. Noone II,
Martin Goldstein, and David Metzman (*By ECF*)
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21. Ascend RE Partners II, LLC (*By ECF*)
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c/o Israel J. Atkin, Esq.
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- c/o Michael Paul Bowen, Esq. (*By E-mail*)
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